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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL (DKT. 362)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to Seal
7 portions of their Response to Waymo’s Objections to Evidence Cited in Defendants’ Sur-Reply (Dkt.
8 362) (the “Administrative Motion”). The Administrative Motion seeks an order sealing certain
9 highlighted portions of Defendants’ Response to Waymo’s Objections to Evidence Cited in
10 Defendants’ Sur-Reply (Dkt. 362) (“Defendants’ Response”).

11 3. Portions of Defendants’ Response contain or refer to trade secret and confidential
12 business information, which Waymo seeks to seal.

13 4. Portions of Defendants’ Response (portions highlighted in yellow) contain, reference,
14 and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the
15 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, which
16 Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo
17 (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31). The public
18 disclosure of this information would give Waymo’s competitors access to in-depth descriptions—and
19 analysis—of the functionality of Waymo’s autonomous vehicle system. If such information were
20 made public, I understand that Waymo’s competitive standing would be significantly harmed.

21 5. Waymo’s request to seal is narrowly tailored to those portions of Defendants’
22 Response that merit sealing.

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1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on May 9, 2017.

4 By /s/ Lindsay Cooper

5 Lindsay Cooper

6 Attorneys for WAYMO LLC
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